

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF NEW YORK

BLACK LOVE RESISTS IN THE RUST, *et al.*,  
individually and on behalf of a class of all others  
similarly situated,

Plaintiffs,

v.

CITY OF BUFFALO, N.Y., *et al.*,

Defendants.

No. 1:18-cv-00719-CCR

**NOTICE OF MOTION FOR LEAVE TO TAKE ADDITIONAL DEPOSITIONS**

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law and Declaration, Plaintiffs, by their undersigned attorneys, will move the Court at the United States Courthouse for the Western District of New York, 2 Niagara Square, Buffalo, NY 14202, at a date and time to be determined by the Court, for an Order granting leave to take additional depositions upon Defendants pursuant to Federal Rules of Civil Procedure 26(b), 30(a)(2), and Local Rule of Civil Procedure 7(d)(3).

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Local Rule of Civil Procedure 7(a)(1), Plaintiffs hereby state that they intend to file and serve reply papers. Pursuant to Local Rule of Civil Procedure 7(b)(2)(B), if the Court does not set deadlines by order, any opposition will be due within fourteen days of service of this Motion, and any reply papers will be due within seven days of service of the opposition papers.

Dated: December 15, 2022

Respectfully Submitted,

/s/ Claudia Wilner

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 15, 2022, the foregoing document was filed with the Clerk of the Court and served in accordance with the Federal Rules of Civil Procedure, and/or the Western District's Local Rules, and/or the Western District's Case Filing Rules & Instructions upon all counsel registered through the ECF System.

/s/ Claudia Wilner